

EXHIBIT 2

Declaration of Ayyub Ibrahim in Support of Motion to Amend Case Schedule

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

In re Google Generative AI Copyright Litigation

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Master File Case No. 5:23-cv-03440-EKL-SVK
Consolidated Case No. 5:24-cv-02531-EKL-SVK

**DECLARATION OF AYYUB IBRAHIM IN
SUPPORT OF PLAINTIFFS' MOTION TO
AMEND CASE SCHEDULE**

1 I, Ayyub Ibrahim, hereby declare under penalty of perjury as follows:

2 1. I am a CLEAN AI Engineer and data scientist at the Berkeley Institute for Data Science
3 (BIDS) at the University of California, Berkeley. I am a member of BIDS's CLEAN police project, where
4 I use AI and machine learning to process unstructured data from law enforcement and other sources as part
5 of the CLEAN Initiative. I am also the founder of the Machine Learning Justice Lab, which is a startup that
6 develops AI tools for legal and human rights defense communities. In the past, I was the Director of
7 Research for the Innocence Project New Orleans, where I built machine learning tools for community
8 organizations, innocence organizations, and public defender offices. I also had a central role in creating the
9 Louisiana Law Enforcement Accountability Database, a public tool which, using machine learning tools,
10 consolidates and reports on unstructured data from over 600 law enforcement agencies in the State of
11 Louisiana to track police misconduct patterns in the state.

12 2. I make this declaration pursuant to 28 U.S.C. § 1746 in support of Plaintiffs' Motion to
13 Amend Case Schedule. A copy of my current curriculum vitae is attached as **Exhibit A**, setting forth my
14 additional educational experience and qualifications.

15 3. My research and work lie at the intersection of machine learning and human and civil rights.
16 My work and research as part of CLEAN and other organizations have been featured by numerous media
17 outlets. As part of my work, I routinely build machine learning and AI models, and that work necessarily
18 includes writing and reviewing the source code for those models. I have also developed tools to analyze
19 voluminous datasets, including data intended for use as training data for machine learning or generative AI
20 models at all stages of the training pipeline.

21 4. I have extensive experience engaging in the kind of analysis I am doing in this matter,
22 including other matters alleging this precise kind of infringement. The difficulties I have experienced in
23 this matter have severely hampered my ability to engage in the analysis I have been asked to perform. Since
24 July 1, 2025, I have been forced to pause, cease, and restart my work on a specific analysis 8 times,
25 including a continuing outage that began on September 5, 2025 and was only just resolved today,
26 September 12, 2025 (for now)—only after a technical call with Google personnel and a reset of my virtual
27 machine. I was thus not able to do work for more than a week just relating to this last outage.
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ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(i)(3)

I, Lesley E. Weaver, attest that concurrence in the filing of this document has been obtained from the other signatory. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 12th day of September, 2025, at Oakland, California.

/s/ Lesley E. Weaver

Lesley E. Weaver